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A Professional Association

July 13, 2001

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W., TW-A325  
Washington, DC 20554

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Re: Western Wireless Corp. Petition for Designation as an Eligible  
Telecommunications Carrier for the Pine Ridge Reservation in South Dakota  
CC Docket No. 96-45

Dear Ms. Roman Salas:

This letter is written on behalf of Fort Randall Telephone Company, d/b/a Mount Rushmore Telephone Company ("Ft. Randall"), to supplement a previous letter dated June 27, 2001 and demonstrate that: 1) Ft. Randall provides service to customers located on the Pine Ridge Reservation ("Pine Ridge"); and 2) all customers served by Ft. Randall, including customers both on and off Pine Ridge, are included in a single study area.

Ft. Randall's customers on Pine Ridge are located within the Hermosa exchange area. Ft. Randall purchased the Hermosa Exchange from US West Communications, Inc. in 1996. Requests for waivers in connection with this purchase were addressed by the Commission in a *Memorandum Opinion and Order* in Docket DA 96-570, 11 FCC Rcd 11,513 (1996) (the "Order"). Ft. Randall has owned and operated the Hermosa exchange and provided service to customers on Pine Ridge since that time. The following enclosures (numbered as follows) demonstrate this fact:

1. A map from the files of the South Dakota Public Utilities Commission ("SDPUC") showing the eastern and southern boundaries of the Hermosa exchange;
2. A larger scale map from the files of the SDPUC highlighting a portion of the Hermosa exchange boundary in relation to both the Cheyenne River and the town of Red Shirt;
3. An excerpt of a Bureau of Indian Affairs map of Pine Ridge; and
4. An engineering diagram (2 pages) showing the facilities owned and operated by Ft. Randall that serve customers on Pine Ridge.

The first map shows the relationship of a portion of the eastern and southern boundaries of the Hermosa exchange to the Cheyenne River and clearly shows that the Hermosa exchange extends across the Cheyenne River in two locations. In particular, the map shows that the Hermosa exchange includes an area south and east of a bend in the Cheyenne River. This part of the Hermosa exchange includes the town of Red Shirt, which is one of eleven towns located on Pine Ridge. This point is confirmed by the second map, which is also from the files of the SDPUC.

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The third map, which is a portion of the BIA map of Pine Ridge, shows the town of Red Shirt located south of that bend in the Cheyenne River.

The engineering diagrams are from the records of Communication Network Engineers, Inc., consulting engineers to Ft. Randall, and show the location of facilities owned and operated by Ft. Randall within the same part of the Hermosa exchange that serves customers on Pine Ridge.

Taken together, these documents conclusively show that a portion of the Hermosa exchange, including the town of Red Shirt, lies within Pine Ridge and that Ft. Randall is serving customers on Pine Ridge.

The *Order* makes it clear that there is no separate study area relating to either the Hermosa exchange or the portion of the Hermosa exchange that includes a part of Pine Ridge. In the *Order*, the Commission denied the request of petitioners, including Ft. Randall, for the creation of separate study areas for the exchanges purchased from US West. (¶ 26). The Hermosa exchange was in this group. Instead, the petitioners, including Ft. Randall, were required to file "their respective South Dakota affiliates for interstate average schedule settlement purposes." (Ordering clause at ¶ 53). Mount Rushmore Telephone Company ("Mount Rushmore") is the South Dakota affiliate of Ft. Randall. (footnote 81). Filings with the Commission by USAC confirm that there is no separate study area for Ft. Randall and that a single study area includes both Ft. Randall and Mount Rushmore in SD SAC 391660. (See, USAC May 2001 Report to the Commission, Appendix #HC1.)

Ft. Randall submits that this information conclusively shows that Ft. Randall provides service to customers on Pine Ridge and that those customers are included in a study area that includes customers that do not reside on Pine Ridge.

Please contact the undersigned if further information is needed.

Very truly yours,



Richard J. Johnson

Counsel for Fort Randall Telephone Company,  
d/b/a Mount Rushmore Telephone Company,

RJJ/krm

Enclosures

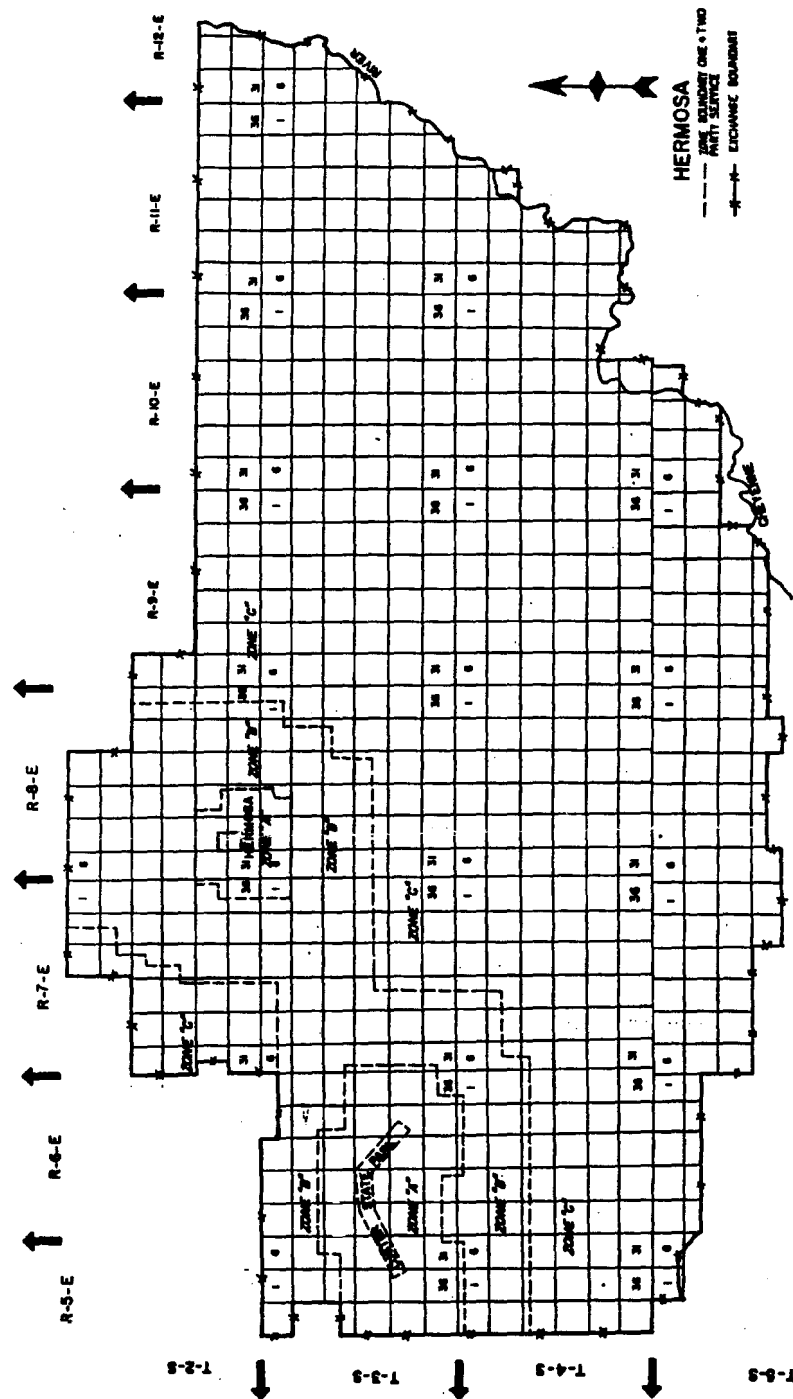
cc: Linda Kinney, OGC  
Andrea Kearney, OGC  
Catherine Schroder, CCB  
Anita Cheng, CCB  
Richard Smith, CCB

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NORTHWESTERN BELL  
TELEPHONE COMPANY

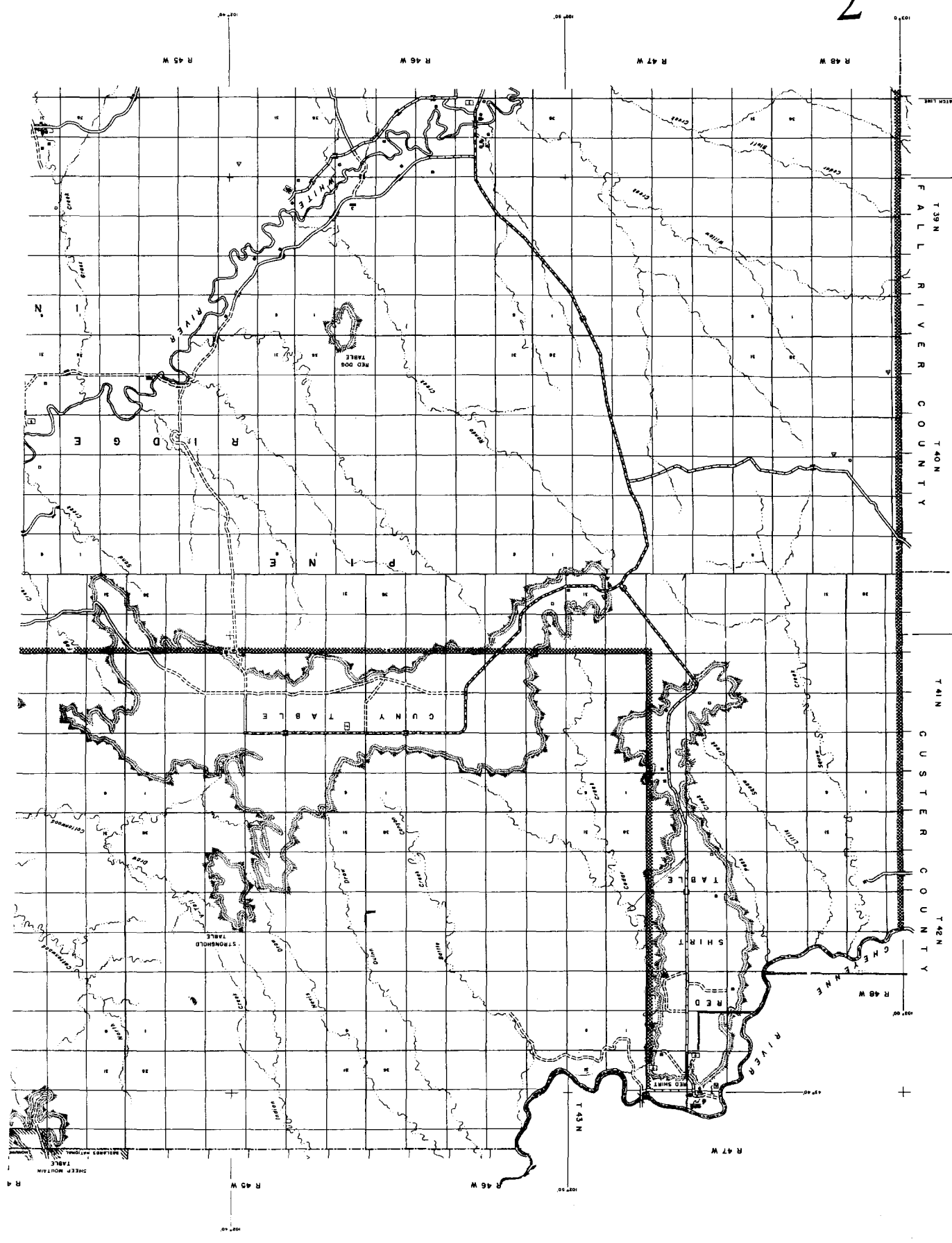
LOCALITY  
SPECIAL RATE  
AREA MAP

HERMOSA, SOUTH DAKOTA  
Fifth Revised SHEET  
CANCELS SHEET ISSUED 11-30-79



ISSUED January 5, 1988 EFFECTIVE February 1, 1988

F-3734-1



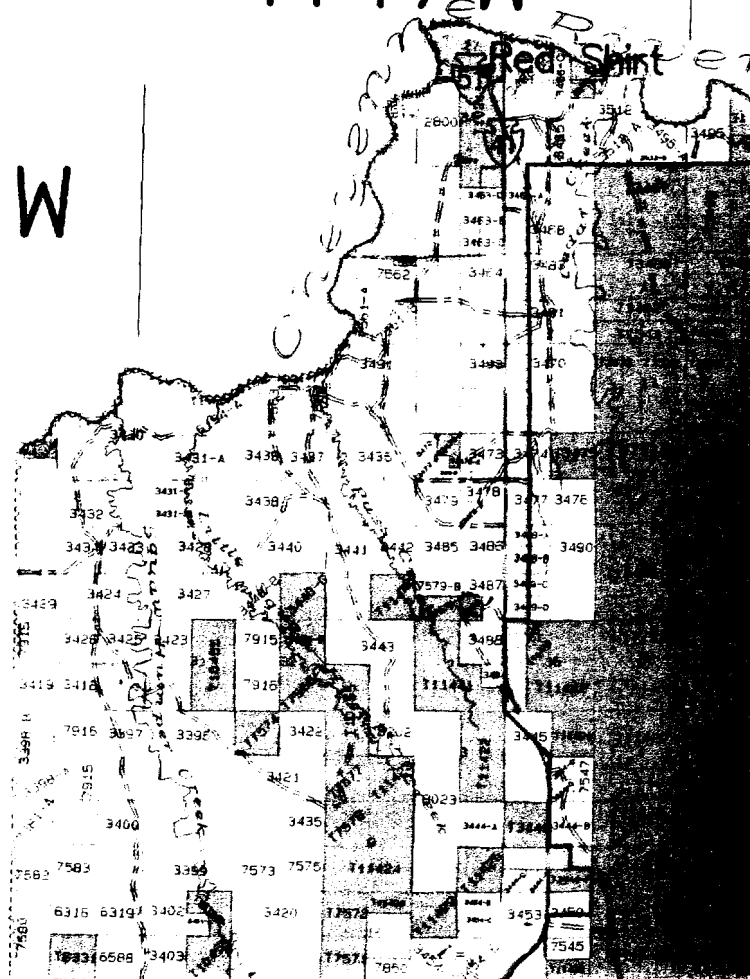


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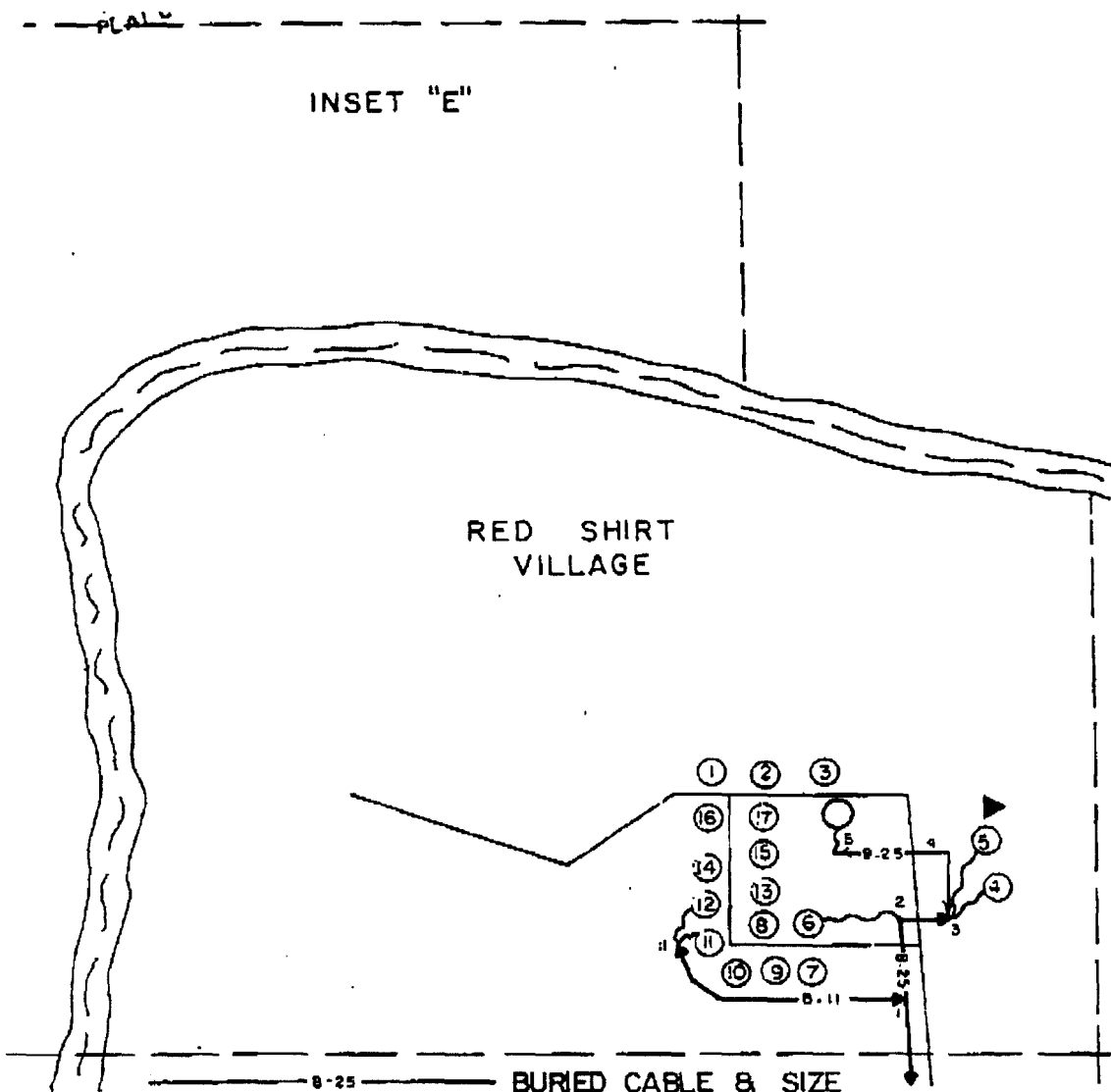
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SOUTH DAKOTA







- B-25 — BURIED CABLE & SIZE
- A — AERIAL CABLE
- B — BURIED WIRE
- — — AERIAL WIRE
- E — NWB BOUNDARY
- I — INDEPENDENT BOUNDARY
- 3 — NUMERAL INDICATES TERMINAL 113 IN L.S.
- T-25 — TOLL CABLE
- A & T — EXCHANGE & TOLL WIRE
- ABT-75 — AERIAL & TOLL CABLE

SEE PLAT 5